

# EXHIBIT 54

Case:17-03283-LTS Doc#:22653 Filed:10/17/22 Entered:10/20/22 18:25:53 Desc: Main  
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## RESPONSE TO OMNIBUS OBJECTION

(i)	<b>Contact details:</b> <b>Address:</b> <b>Telephone:</b> <b>Email address:</b> <b>Designated attorney:</b> <b>Address:</b>	<b>Myrtelina Torres Berríos</b> P.O Box 3011, Guaynabo, Puerto Rico, 00970 787-316-0121 myrtetobe@gmail.com Yarlene Jiménez Rosario, Esq. PMB 133, 1353 Ave. Luis Vigoreaux, Guaynabo, P.R., 00966  <b>Party authorized to settle:</b> <b>Telephone:</b> Yarlene Jiménez Rosario, Esq. (787) 633-6931
(ii)	<b>Caption:</b>	In the United States Federal District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767
	<b>Debtor:</b>	<b>COMMONWEALTH OF PUERTO RICO</b> PROMESA Title III Number 17BK 3283-LTS  FIVE HUNDRED AND FOURTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, OF THE COMMONWEALTH OF PUERTO RICO GOVERNMENT EMPLOYEES' RETIREMENT SYSTEM, AND OF THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO CLAIMS FOR WHICH THE DEBTORS ARE NOT LIABLE  Claim number 28933
(iii)	<b>Reason for opposing the Omnibus Objection:</b>	<ul style="list-style-type: none"> <li>- Non-compliance with Act 184, of August 03, 2004, as amended, known as the Public Service Human Resources Administration Act of the Commonwealth of Puerto Rico, in application of Article 8, Section 8.3 which provides for the implementation of a salary increase of up to five (5) percent for employees who have rendered satisfactory service for a period of three consecutive years.</li> <li>- Omission of my name of the list of claimants of case 201-07-0008.</li> </ul>
(iv)	<b>Documentation:</b>	Copy of Article of Act 184, as amended.

**Signature:** \_\_\_\_\_ [Signature]

"Public Service Human Resources Administration Act of the Commonwealth of Puerto Rico" [Act 184-2004, as amended]

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[...] alternative compensation may be used to: retain qualified personnel, obtain qualified personnel for difficult-to-recruit positions, and motivate employees.

- (a) Certificates of recognition for the work performed.
- (b) Productivity bonus, representing twenty (20) percent of biweekly wages.
- (c) Bonuses for work team performance.
- (d) Activities in which the employee is informed of the successes achieved by the agency and employee recognition activities.
- (e) Training in and outside of Puerto Rico.
- (f) Graduate and undergraduate scholarships.
- (g) Gymnasium facilities, health units, cafeterias, childcare.
- (h) Benefits of lodging, meals and uniforms for all employees who require them due to the nature of the service they perform.
- (i) Bonuses for attendance and punctuality; such bonus shall be separate and apart from any corresponding payment for excess accumulated leave.
- (j) Bonus to employees who retire from the system.
- (k) Days or hours granted without charge to any leave balance.

2. All employees have the opportunity to develop professionally, either on their own initiative or as managed by the organization. Some payment methods that promote these considerations are:

- (a) *Additional skills-based pay* — To the extent that employees develop and apply alternative skills to their main function, additional compensation may be granted as part of their salary.
- (b) *Competency development* — To the extent that the agency knows what competencies are required for excellent employee performance, it may select and train individuals to achieve that level of performance. As a result, when employees perform at an optimal level, overall performance of the agency is maximized. This premise implies that every employee who succeeds in implementing the new work processes desired by the agency and who manages to be a driver of continuous change and innovation shall receive competency-based pay.
- (c) When recruiting personnel, an economic incentive can be incorporated as part of the base salary. It shall be awarded in classes where a high level of education and experience is required.
- (d) Salary adjustments subject to performance and productivity evaluations.

3. *[Three-Year Increase]* — Non-union and managerial public employees who have held a regular position for a continuous period of three years of service, without having received any other salary increase shall receive an increase of up to five (5) percent of their salary or its equivalent in intermediate rates. Employees must have demonstrated satisfactory service during the three-year period as evidenced by their evaluation sheets. The Appointing Authority shall send a written notice to any employee who fails to meet this consideration. The notice shall include the reasons why the employee is not given the aforementioned increase and shall warn the employee of the right to appeal before the Appeals Commission.



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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **28933 - DN 22653**

Signed this 17<sup>th</sup> of November, 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

